

## COMMONWEALTH OF MASSACHUSETTS

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Western Massachusetts )  
Electric Company )

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**DTE 04-106**

### **Second Set of Information Requests of Western Massachusetts Industrial Customers Group**

#### Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by Western Massachusetts Industrial Customers Group (“WMICG”) to Western Massachusetts Electric Company (“WMECo” or “the Company”), in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phone-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which

information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

5. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

6. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department of Telecommunications and Energy (“DTE”), and a copy on the Jon Geary Hearing Officer for the DTE, as well as serving the appropriate number of copies to all parties and participants on the service list in this proceeding.

7. Please provide responses to all questions within 5 days. If this is not possible for any of the questions, please indicate which questions will take longer than 5 days within the earlier responses.

#### Information and Document Requests

WMICG 2-1. Please explain and provide all workpapers used to derive the Assumed Market Value of the Power Contracts for 2003 and 2004 in the response to IR DTE 1-26, p. 4.

WMICG 2-2 Please explain why the Wholesale Market Value is lower on a per unit basis in 2004 as compared to 2003. Please provide the average wholesale price for energy and other products in the wholesale market for 2003 and 2004 as reported by ISO-NE.

WMICG 2-3 Does the average wholesale price used in IR DTE 1-26 include the value of any market products other than the energy market? If not, why not?